

# EXHIBIT E

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,  
  
Plaintiff,

v.

GOOGLE LLC,  
  
Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

RESPONSIVE CONTENTIONS REGARDING  
NON-INFRINGEMENT AND INVALIDITY

International Conference on Circuits, Systems, Electronics, Control & Signal Processing at 315-320 (“Lee”)	
Makino, <i>Grape and Project Milkyway</i> , Proceedings of the 6th East Asian Meeting of Astronomy	October 18-22, 2004
Makino et al, <i>GRAPE-6: Massively-Parallel Special-Purpose Computer for Astrophysical Particle Simulations</i> , Astronomical Society of Japan	1993
MANTRA I	1993
Okumura et al, <i>GRAPE-3: Highly Parallelized Special-Purpose Computer for Gravitational Many-body Simulations</i> (“GRAPE-3”)	1992
Okumura et al, <i>Highly Parallelized Special-Purpose Computer, GRAPE-3</i> , Astronomical Society of Japan	1992
Shirazi et al, <i>Quantitative Analysis of Floating Point Arithmetic on FPGA Based Custom Computing Machines</i> (“Shirazi”)	April 1995
SPERT-II	1995
Sudha et al, <i>An Efficient Digital Architecture for Principal Component Neural Network and its FPGA Implementation</i> (“Sudha”)	2007
Tong et al, <i>Reducing Power by Optimizing the Necessary Precision/Range of Floating-Point Arithmetic</i> (“Tong”)	June 2000
SYNAPSE-1	1993
Texas Instruments TMS320C32 DSP	1995
Xilinx Virtex-4 FPGA	2007

## B. Anticipation

Google contends that the following prior art anticipates the asserted claims of the patents-in-suit under 35 U.S.C. § 102:

- Belanović / Belanović and Leeser
- GRAPE-3

here, too, Singular's Infringement Contentions appear to render this language at least ambiguous (if not entirely meaningless) by conflating "inputs" with "numerical values." These and potentially other indefiniteness issues may be the subject of claim construction briefing and argument.

Respectfully submitted,

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By: /s/ Matthias Kamber

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